

ELEMENTS OF A FRAUD POLICY

The purpose of a written Fraud Policy is to establish an anti-fraud culture covering work practices and business ethics *within your organization*. Your policy should indicate the fight against fraud is endorsed and supported at the most senior level of your organization and needs to be communicated to <u>all</u> employees (irrespective of grade, position, or length of service), contractors, and suppliers.

A written Fraud Policy should be simple, focused, and can be brief. It should:

- Make it clear all employees have a responsibility for fraud prevention and detection
- Encourage employees to report any suspicion of fraud
- Identify procedures to be followed if fraud is suspected
- Allocate responsibility for investigating fraud
- Outline actions to be taken in the event of fraud (up to termination and/or legal recourse)

It can be helpful to identify actions that might constitute fraud in your policy. These can include:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies or other assets
- Impropriety in the handling of money or financial transactions
- Profiteering as a result of insider knowledge of your organization's activities
- Disclosing confidential or proprietary information to outside parties
- Accepting or soliciting anything of material value from contractors, vendors, or persons providing services to the company
- Destruction, removal, or inappropriate use of business assets

There are many samples of Fraud Policies on the internet that can be accessed by conducting a simple search on "fraud policy." We hope this information is beneficial to you in the development of your fraud policy